



- (e) The cut-off date for designation of Plaintiffs' and Defendants' trial expert(s) as provided in FRCP 26(a)(2) shall be agreed to by the parties and set by the Court at the status conference to be held before the close of discovery. Depositions of the experts shall be taken within 45 days of designation. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with FRCP 26(a)(2)(B).
- (f) Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the Court may deem such challenges waived.

**Dispositive Motions**

Before a dispositive motion is filed, the parties will exchange demand and offer letters in an effort to reach resolution of the case. A status hearing will be set on a date determined by the Court, approximately two weeks before the close of discovery. At this time, the parties will report on any outstanding discovery issues, as well as on the possibility of settlement and whether a settlement conference with a judge may be helpful. The parties should expect to be referred to a magistrate judge for settlement discussions before filing a motion for summary judgment.

Also at this status hearing, the court will set a schedule for disposition of the case, including trial dates.

**Consent to Proceed Before a Magistrate Judge**

The parties \_\_\_\_ consent X do not consent to have their case proceed before a magistrate judge.

Dated: June 18, 2008

By: /s/David Porter  
David Porter, Esq.  
Attorney for the Plaintiffs

By: /s/Bradford LeHew  
Bradford LeHew  
Attorney for Plaza 440 and Edy Klein

By: /s/Kristi Browne  
Kristi Browne, Esq.  
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By: /s/Robert H. Brown  
Robert H. Brown, Esq.  
Attorney for Admiral Security Services

ENTER

Date: \_\_\_\_\_, 2008

\_\_\_\_\_  
JOAN HUMPHREY LEFKOW  
U.S. District Judge